

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**LEON WEINGRAD**, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

**EXACT CARE PHARMACY, LLC**

*Defendant.*

Case No.

2:25-cv-1843

**Motion to File Under Seal**

Pursuant to L.R. 5.1.5(a)(2) Plaintiff Leon Weingrad respectfully moves to file under seal certain exhibits to Plaintiff's Opposition to Exact Care's Motion to Bifurcate Discovery, specifically: Plaintiff's Brief in Opposition of the Motion to Bifurcate Discovery ("Brief") and the Declaration of Leon Weingrad in connection with the Brief both reference the following call recordings:

Exhibit 2 - November 27, 2024 Call (+15032888192-2411271048)

Exhibit 3 - February 28, 2025 Call (+15037556487-2502280819)

Exhibit 5 - First February 27, 2025 Call (+15034613416-2502270745)

Exhibit 6 - Second February 27, 2025 Call (+15034046898-2502270943)

Exhibit 7 - First March 6, 2025 Call (+18773557225-2503060902)

Exhibit 8 - Second March 6, 2025 Call (+15038560896-2503061217)

Exhibit 9 - March 7, 2025 Call (+18773557225-2503070920)

Like the forged and altered recordings presented by Exact Care, the genuine, authentic call recordings likewise include discussion of confidential health information, such as information regarding an individual's medications and health insurance information. The call recordings also include discussion of confidential personal information, such as an individual's date of birth.

Due to the confidential nature of information discussed in the call recordings, Plaintiff respectfully requests to file the foregoing exhibits under seal.

Plaintiff's publicly filed Brief and the Declaration of Leon Weingrad and associated forensic report and telephone billing records contain references to and a discussion of pertinent non-confidential portions of information discussed in the call recordings. Accordingly, Plaintiff's request to file only the call recordings themselves (and their associated converted MP3 files) under seal properly balances the need to maintain confidentiality of certain information discussed in the call recordings and the Court's interest in having its proceedings open to the public.

Therefore, good cause exists, and Plaintiff respectfully moves the Court to enter an Order permitting Plaintiff to file the foregoing exhibits under seal.

Date: July 8, 2025

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
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**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on July 8, 2025, which will automatically send a copy to all attorneys of record on the case.

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